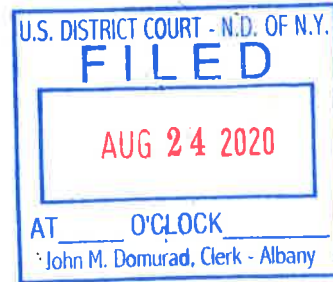


UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

Darryl A. Gilmore Sr.
Plaintiff(s)
Stephanie Gilmore

vs.

Uncommon School TROY PREP
Defendant(s)
Johanna Martin

Civil Case No.: 1:20cv979
(LEK/DJS)CIVIL
RIGHTS
COMPLAINT
PURSUANT TO
42 U.S.C. § 1983Plaintiff(s) demand(s) a trial by: ☒ JURY ☐ COURT (Select only one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4) and 2201.

PARTIES

2. Plaintiff: Darryl A. Gilmore Sr.
Address: 170 A. Vandenburgh Place
TROY NY 12180

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: Uncommon School TROY PREP
Official Position: School.
Address: 2 POLK ST.
TROY New York
12180

b. Defendant:

Jehanna Martin

Official Position:

Associate Chief Operating Officer

Address:

2 POLK STREET

TROY New York

12180

c. Defendant:

Maise Wright

Official Position:

Principal

Address:

2 POLK STREET

TROY New York

12180

Additional Defendants may be added on a separate sheet of paper.

4.

FACTS

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).

Jehanna Martin published slanderous
an libel statements. Causing plaintiff
to be banned from school grounds.

Maise Wright made defamatory statements
causing law enforcement to be summoned.

5.

CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

Johanna Martin's Slandorous and
libel Statimnts published caused
harm and pain + Suffering of
plaintiff.

SECOND CAUSE OF ACTION

plaintiff affected egpecially.
plaintiff unable to attend
children school events.

THIRD CAUSE OF ACTION

plaintiff in constant fear of
being detained by law enforcement
due to Slandorous statements
published by defendants.

6. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

- official letter of apology
- retraction of slanderous statements
- punitive damages.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 8/24/2020

Darrell A. Gilmore Sr.
Stephanie Gilmore
Signature of Plaintiff(s)
(all Plaintiffs must sign)

02/2010